

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

RICHARD PIOTROWSKI,)	
)	
Plaintiff,)	C.A. NO. 06-631-SLR
)	
v.)	TRIAL BY JURY OF
)	TWELVE DEMANDED
MAO M. IAN and SUI MAI,)	
INSURANCE CORP. OF HANNOVER,)	
and ALLSTATE INSURANCE COMPANY,)	
)	
Defendants.)	

DEFENDANT ALLSTATE'S ANSWER TO AMENDED COMPLAINT

1. Admitted upon information and belief.
2. No response required.
3. No response required.
4. No response required.
5. Admitted.
6. Admitted upon information and belief.
7. No response required.
8. The policy speaks for itself.
9. Answering defendant is without sufficient information to answer these allegations.
10. Answering defendant is without sufficient information to answer these allegations.
11. Answering defendant is without sufficient information to answer these allegations.
12. Answering defendant is without sufficient information to answer these allegations.
13. Answering defendant is without sufficient information to answer these allegations.
14. Answering defendant is without sufficient information to answer these allegations.

15. Answering defendant is without sufficient information to answer these allegations.

COUNT I

16. Answering defendant incorporates by reference paragraphs 1 through 15 of this Answer.

17. No response required.

18. No response required.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

COUNT II

19. Answering defendant incorporates by reference paragraphs 1 through 18 of this Answer.

20. No response required.

21. No response required.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

COUNT III

22. Answering defendant incorporates by reference paragraphs 1 through 21 of this Answer.

23. No response required.

24. No response required.

25. No response required.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

COUNT IV

26. Answering defendant incorporates by reference paragraphs 1 through 25 of this Answer.

27. No response required.

28. Denied.

29. Denied.

WHEREFORE, defendant Allstate demands judgment in its favor plus costs.

AFFIRMATIVE DEFENSES

30. The complaint fails to state a claim against defendant Allstate Insurance Company upon which relief can be granted.

MICHAEL A. PEDICONE, P.A.

By: /s/ Michael A. Pedicone
Michael A. Pedicone, Esquire (No. 2424)
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Attorney for Third Party Defendant
Allstate Insurance Company

Dated: September 13, 2007

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Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Defendant Allstate's Answer to Amended Complaint to be served via e-file and US mail on September 13, 2007, upon:

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